

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE**

VALORES MUNDIALES, S.L. and
CONSORCIO ANDINO, S.L.

Plaintiffs,

v.

BOLIVARIAN REPUBLIC OF VENEZUELA,

Defendant.

C.A. No. 1:23-mc-00298-LPS

**PLAINTIFFS' MOTION FOR AN ORDER AUTHORIZING THE ISSUANCE OF A
WRIT OF ATTACHMENT *FIERI FACIAS***

Plaintiffs and judgment creditors, Valores Mundiales, S.L. and Consorcio Andino, S.L. (together, “Plaintiffs” or “Valores/Consorcio”), hereby move, in accordance with 28 U.S.C. § 1610(c), Rule 69 of the Federal Rules of Civil Procedure, 10 *Del. C.* § 5031, and 8 *Del. C.* § 324, for an order authorizing the Clerk of the Court to sign, seal, and issue Plaintiffs’ proposed writ of attachment *feri facias* to Delaware corporation PDV Holding, Inc. (“PDVH”) against its shares, which are wholly owned by Petróleos de Venezuela, S.A. (“PDVSA”), alter ego of Defendant and judgment debtor Bolivarian Republic of Venezuela (“Venezuela”), and against any other assets or rights that PDVSA may have incident to its ownership of those shares; authorizing the U.S. Marshals Service to serve that writ upon PDVH, and ordering such other and further relief as this Court deems just and proper.

On June 7, 2023, a foreign judgment was registered in the above-captioned action, D.I. 1, reflecting a final judgment that was rendered in the action styled *Valores Mundiales, S.L. et al. v. Bolivarian Republic of Venezuela*, No. 19-cv-00046-ACR, in the United States District Court for the District of Columbia on May 22, 2023, in favor of Plaintiffs and against

Venezuela. That judgment remains unpaid. In aid of execution on that judgment, Plaintiffs respectfully request that this Court (1) authorize the issuance of a writ of attachment *fiери facias*, in the form attached hereto as Exhibit 1, to PDVH attaching the shares of PDVH that belong to PDVSA, as alter ego of Venezuela, along with any other rights or assets incident to that ownership interest that may belong to PDVSA, and (2) issue a praecipe, in the form attached hereto as Exhibit 2, directing the Clerk of the Court to issue the writ of attachment *fiери facias* to the U.S. Marshals Service for service on PDVH.

The basis for this application is set forth in the *Brief in Support of Motion for an Order Authorizing the Issuance of a Writ of Attachment Fieri Facias Pursuant to 28 U.S.C. 1610(c)*, the Declaration of Miguel López Forastier and its respective accompanying exhibits.

Dated: June 29, 2023

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